

REMARKS/ARGUMENTS

The final office action of June 19, 2003 has been carefully reviewed and these remarks are responsive thereto. Reconsideration and allowance of the instant application are respectfully requested. Claims 1, 3-9 and 11-28 remain in this application.

Claims 1, 3-9 and 11-17, 19, 20, 22, 23, 25, 27 and 28 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. patent no. 5,956,034 to Sachs et al. ("Sachs '034") in view of "USING NETSCAPE 2" and claims 18, 21, 24 and 26 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over this combination further in view of U.S. patent no. 6,493,734 to Sachs et al. ("Sachs '734"). Applicants respectfully traverse this rejection.

The action alleges that Sachs '034 describes all the features of independent claims 1 and 9, but for providing the user access to the enhanced functionality in response to the user selecting the element of the immersive reading page, wherein no visual indication of the enhanced functionality is provided prior to the user selecting the element of the immersive reading page. To access a function in Sachs '034, the user must select an icon providing a visual indication of the function. To overcome this deficiency, the action relies on USING NETSCAPE 2.

As amended claims 1 and 9 each recite, among other features, providing the enhanced functionality in response to the user selecting the element of the immersive reading page, wherein no visual indication of the enhanced functionality is provided prior to the step of providing the enhanced functionality. The combination of Sachs '034 and USING NETSCAPE 2, even if proper, would not have resulted in the invention of amended claims 1 and 9. Specifically, the combination that would have resulted would have allowed a user to select an element of the page (e.g., a word) by a right click operation, thereby displaying a list of functionality in a menu, where one function may be activated responsive to selection of the function from the list. In stark contrast, the invention of claim 1 provides no visual indication of the enhanced functionality prior to the step of providing the enhanced functionality. Thus, according to an illustrative implementation of the claim 1 invention shown in figure 5, when a user taps on an area immediately to the left of the page number 512, a previous page is displayed, without any visual indication of the page turning function being provided prior to the page

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turning function actually occurring. For at least this reason, amended claims 1 and 9 are patentably distinct from the combination of Sachs '034 and USING NETSCAPE 2.

Claims 3-8 and 11-17, 19, 20, 22, 23, 25, 27 and 28, which ultimately depend from one of claims 1 and 9, are patentable over the applied art for the same reasons as their base claim, and further in view of the novel features recited therein. For example, claims 4 and 12 each call for the step of invoking a training mode for teaching the association to a user. To show this feature, the action points to fig. 2, element 86a (program instructions) and col. 4, ll. 35-55. However, at most, these portions of the Sachs '034 mention in passing "program instructions". Notably, these portions of Sachs '034 are wholly devoid of any teaching or suggestions of invoking a training mode for teaching the association (between element of the immersive reading page and enhanced functionality) to a user.

Significantly, Sachs '734 fails to overcome the deficiencies noted with respect to Sachs '034 and USING NETSCAPE 2. Hence, the combination of Sachs '034, USING NETSCAPE 2 and '734, even if proper, does not result in the invention of claims 1 and 9. Thus, since claims 18, 21, 24 and 26 depend from one of claims 1 and 9, they are patentably distinct from the proposed combination for the same reasons as their base claim, and further in view of the novel features recited therein.

CONCLUSION

It is believed that no fee is required for this submission. If any fees are required or if an overpayment is made, the Commissioner is authorized to debit or credit our Deposit Account No. 19-0733, accordingly.

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All rejections having been addressed, applicants respectfully submit that the instant application is in condition for allowance, and respectfully solicits prompt notification of the same.

Respectfully submitted,

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Dated: February 24, 2004

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